



DIAZ & MOSKOWITZ, PLLC

Attorneys at Law

John A. Diaz, Esq.

www.dmlawny.com

Garden City Office:
1225 Franklin Avenue
Suite 325
Garden City, NY 11530
(516) 686-6444
(516) 686-6444

New York Office:
225 Broadway
Suite 715
New York, NY 10007
(212) 227-8208
Fax (212) 566-8165

January 27, 2021

VIA ECF

The Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: U.S. v. Amar Ahmed: S2 16 Cr. 826 (LTS)

Dear Judge Swain:

On December 23, 2020, I was assigned to represent Mr. Ahmed, pursuant to the provisions of the Criminal Justice Act, to prepare a reply to the Government's response to Mr. Ahmed's *pro-se* motion for compassionate release. The purpose of this letter is to respectfully request an additional 30 days to file Mr. Ahmed's reply. Counsel has conferred with the Government regarding this request and they have no objection.

The reasons for the request are that counsel has had very limited contact with Mr. Ahmed as a result of lockdowns imposed at the correctional facility in order to stem the spread of the COVID-19 virus. Additionally, there are documents and certificates that counsel wishes to include in Mr. Ahmed's reply that counsel has not been able to physically receive. Counsel was finally able to schedule his first legal call with Mr. Ahmed for next week and an additional 30 days will allow me to discuss and review the reply with Mr. Ahmed and receive any documents he wishes to submit.

The Court's time and consideration of this matter are greatly appreciated.

The requested extension is granted. DE# 539 resolved.

SO ORDERED.

1/27/2021

/s/ Laura Taylor Swain, USDJ

Respectfully submitted,

/s/

John A. Diaz, Esq.

cc: All Counsel (*via ECF*)